

EXHIBIT 15

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND; STATE OF
DELAWARE; STATE OF CALIFORNIA; STATE
OF COLORADO; STATE OF ARIZONA; STATE
OF CONNECTICUT; DISTRICT OF COLUMBIA,
STATE OF HAWAI'I; STATE OF ILLINOIS;
OFFICE OF THE GOVERNOR *ex rel.* Andy
Beshear, in his official capacity as Governor of the
COMMONWEALTH OF KENTUCKY; STATE OF
MAINE; COMMONWEALTH OF
MASSACHUSETTS; PEOPLE OF THE STATE OF
MICHIGAN; STATE OF MINNESOTA; STATE OF
NEVADA; STATE OF NEW JERSEY; STATE OF
NEW MEXICO; STATE OF NEW YORK; STATE
OF NORTH CAROLINA; STATE OF OREGON;
JOSH SHAPIRO, in his official capacity as
Governor of the COMMONWEALTH OF
PENNSYLVANIA; STATE OF RHODE ISLAND;
STATE OF VERMONT; STATE OF
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, operating as
AmeriCorps; and JENNIFER BASTRESS
TAHMASEBI, in her official capacity as Interim
Head of the Corporation for National and
Community Service;

Defendants.

Civ. No. 25-cv-01363 (DLB)

DECLARATION OF JOE BRINGARDNER, DIRECTOR OF SERVE KENTUCKY

Pursuant to 28 U.S.C. § 1746, I, Joe Bringardner, hereby declare as follows:

1. I am a resident of the Commonwealth of Kentucky. I am over the age of 18 and have personal knowledge of all the facts stated herein, including as based on my experienced and

information provided to me. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the Kentucky Cabinet for Health and Family Services (CHFS) as the Executive Director of the Serve Kentucky Commission (“Serve Kentucky”).

3. Serve Kentucky is responsible for awarding and managing the funds received from the federal agency.

4. As the Executive Director of Serve Kentucky, I have accountability for oversight of the federal grant award received from AmeriCorps.

5. Serve Kentucky was created to serve as a conduit for federal funds that support AmeriCorps programs operating exclusively within the Commonwealth of Kentucky, to encourage and recognize volunteerism, and to assist in service program development.

6. **Advisory Role:** Serve Kentucky is as an advisory body to the Executive Director and is charged with considering matters related to national service in Kentucky, as well as any matters referred by the Governor and the Secretary of the Cabinet for Health and Family Services. Additionally, it performs duties mandated under the National and Community Service Act of 1990.

7. **Program Contributions:** AmeriCorps and AmeriCorps Seniors play a crucial role in community development. In 2024, more than 5,200 Americans united to meet local needs and strengthen neighborhoods with AmeriCorps investing more than \$33.7 million in federal funding. These service members work across Kentucky at more than 700 locations – supporting schools, food banks, homeless shelters, veterans’ facilities, healthcare facilities and other essential community institutions. Their efforts not only fortify community resilience but also generate over \$8.7 million in additional local resources through public-private partnerships.

8. **Grant Receipts and Reviews:** Serve Kentucky receives and manages Prime Grants from AmeriCorps, awards and disburses subgrants from the Prime Grants, monitors subgrantees for performance and compliance with grant requirements, provides training and technical assistance for subgrantees, and functions as liaison between AmeriCorps and subgrantees. Serve Kentucky manages two separate types of grants involving AmeriCorps/Corporation discretionary funds and nondiscretionary funds. The first type is competitive funding. In this process Serve Kentucky issues Requests for Applications (RFA) that are based on federal Notices of Funding Opportunity (NOFO) issued by AmeriCorps. Grant applicants submit application materials in response to the RFA, and AmeriCorps exercises its discretion in approving grant applications. The second type is formula funding. In this process Serve Kentucky receives Congressionally-appropriated money from AmeriCorps, and selects the subgrantees for these allocated funds based on federal NOFOs but in accordance with pre-determined Governor, CHFS, and/or state priorities, and in accordance with 45 C.F.R. § 2550.80.

9. Currently, Serve Kentucky manages operational grants for 20 subgrantees, including Blueprint 502, Christian Appalachian Project, Conservation Legacy, Family Scholar House, Global Game Changers, Green River Area Development District, Hazard Community and Technical College, Hindman Settlement School, Homeless and Housing Coalition of Kentucky, I Would Rather Be Reading, Jefferson County Public Schools, Kentucky Environmental Education Council, Kentucky Health Departments Association, Lead For America, Northern Kentucky University Research Foundation, Ohio Valley Education Cooperative, Operation UNITE, Partners for Rural Impact, Teach For America – Appalachia, and Teach Kentucky. Subgrantees use the funds they receive from Serve Kentucky/AmeriCorps to run programs to benefit Kentuckians. The funds are used to recruit, manage, pay, and train AmeriCorps members

and handle program operations and costs, monitor and support host sites to ensure compliant and effective service. Many subgrantees then post AmeriCorps members at partner organizations called host sites. The host sites typically provide service sites for members and supervise regular service and verify hours and performance measures.

10. Serve Kentucky also manages six federal AmeriCorps planning grants with Cabinet for Health and Family Services agencies (the Department for Aging and Independent Living; the Department for Behavioral Health, Developmental and Intellectual Disabilities), CivicLex, Feed Louisville, Pine Mountain Settlement School, and The Book Works.

11. AmeriCorps VISTA connects members to various organizations to fight poverty. Through fundraising, volunteer recruitment, program development, and more, Members gain skills that put them on track for a life of service in the public, private, or nonprofit sectors. While Serve Kentucky does not manage any AmeriCorps VISTA programs, many of our subgrantees do including Northern Kentucky University Research Foundation and Homeless and Housing Coalition of Kentucky.

12. The AmeriCorps National Civilian Community Corps (AmeriCorps NCCC) is a full-time, team-based, residential national service program for individuals between the ages of 18 and 26. Members are deployed nationwide to address critical needs, including, but not limited to, the construction of housing for families in need and the enhancement of national disaster response capabilities.

13. Serve Kentucky has executed a Memorandum of Understanding (MOU) with the AmeriCorps NCCC Southern Region to streamline the request, deployment, and use of NCCC teams. This agreement facilitates the expedited mobilization of teams in the event of disasters and

supports service projects that advance identified focus areas in collaboration with nonprofit, faith-based, and community-based organizations.

14. **Educational and Long-Term Benefits:** In addition to immediate community support, AmeriCorps members earn the Segal AmeriCorps Education Award upon successfully completing their service, which has historically supported the educational pursuits of thousands of Kentuckians. Since 1994, more than 17,000 Kentucky residents have served approximately 26 million hours through AmeriCorps and Serve Kentucky, earning Segal AmeriCorps Education Awards totaling more than \$66 million. Higher education institutions and other organizations in Kentucky have received more than \$29.3 million in education award payments since 1994.

15. **Kentucky At a Glance Report: 2024 Year in Review**

The following table represents national service activity completed between February 23, 2024 and February 21, 2025.

Program	Projects	Service Locations	Completed Participants	Education Awards	Federal Funding
AmeriCorps National	14	16	113	\$301,632	\$900,241
AmeriCorps NCCC	10	10	90		
AmeriCorps State	20	354	945	\$3,794,676	\$11,079,569
AmeriCorps VISTA	15	48	79	\$560,705	\$1,998,628
AmeriCorps Seniors Foster Grandparents	7	105	362	N/A	\$2,727,547
AmeriCorps Seniors RSVP	11	213	3,409	N/A	\$2,365,408
AmeriCorps Seniors Senior Companion Program	4	32	175	N/A	\$1,501,202
AmeriCorps National Planning Grant	2				\$480,000
AmeriCorps State Planning Grant	3				\$204,148
State Commission Operations Support	1				\$513,023
Volunteer Generation Fund	2				\$1,541,239

16. **Anticipated Impact for FY 25 Due to Loss of Federal Agency Staff:** The imminent reduction – up to 85% – of the AmeriCorps Agency staff is anticipated to have profound and harmful effects, including those discussed below.

17. **Delayed Grant Reviews:** A drastic reduction in staffing will directly impair AmeriCorps' capacity to review and process grant applications in a timely manner. Given the rigorous processes required to ensure compliance and quality, delays in grant reviews will likely cascade, affecting subsequent funding decisions.

18. **Program Award Disruptions:** Timely grant review is integral to awarding funds and ensuring programs have the necessary resources to launch. Any delays in this process could shift the start dates of federally funded programs, jeopardizing the execution of projects slated for a September 1, 2025, commencement.

19. **Community and Member Impact:** AmeriCorps programs serve as critical infrastructure for communities across the Commonwealth of Kentucky. Any delay in the launch of these programs would significantly disrupt the delivery of essential services to schools, food banks, shelters, and other vital community institutions. Moreover, such delays would directly harm AmeriCorps members and senior volunteers who rely on timely service engagement for both their professional development and personal well-being. The resulting ripple effects would not only compromise immediate community needs but also threaten the long-standing trust, resilience, and capacity that have been cultivated through years of collaborative national service efforts across Kentucky.


20. Late on Friday, April 25, 2025, I received a letter from Jennifer Bastress Tahmasebi, acting Head of AmeriCorps, a copy of which is attached to the Declaration as Exhibit A, and which notified Serve Kentucky that the federal grants for 21 of Serve Kentucky's 28 grants

were terminated. These operational and planning grants are for: Blueprint 502; Cabinet for Health and Family Services Department for Aging and Independent Living; Cabinet for Health and Family Services Department for Behavioral Health, Developmental and Intellectual Disabilities; Christian Appalachian Project; CivicLex; Conservation Legacy; Family Scholar House; Feed Louisville; Hazard Community and Technical College; Hindman Settlement School; I Would Rather Be Reading; Kentucky Environmental Education Council; Kentucky Health Departments Association; Ohio Valley Education Cooperative; Operation UNITE; Pine Mountain Settlement School; Teach For America-Appalachia; Teach Kentucky; and The Book Works. The termination of these grants affects 21 programs with **\$9,097,659** in funding and 691 members.

21. Serve Kentucky does not possess the financial resources necessary to absorb or replace the loss of these terminated grants. Our funding structure relies on partner organizations to provide the required matching funds needed to operate AmeriCorps programs; Serve Kentucky does not extend direct financial support to awarded subgrantees. As a result, organizations that depend heavily on AmeriCorps funding to deliver essential services now face an immediate and critical threat to their operations. Many will be forced to significantly scale back or, in some cases, cease operations entirely. What has historically been an efficient and sustainable funding model is now exposed as highly vulnerable to abrupt disruptions of this magnitude. The sudden termination of these grants, coupled with Serve Kentucky's inability to compensate for the shortfall, has far-reaching and potentially irreversible consequences. Core community services – including education, disaster response, food security, and support for vulnerable populations – are now at serious risk of reduction or elimination. Without urgent intervention and strategic support, Kentucky stands to lose vital national service infrastructure that has been built through decades of investment, collaboration and trust.

22. The termination of FY 24 AmeriCorps grants, coupled with the reduction in AmeriCorps Federal Agency staffing, poses an immediate and severe threat to the operational integrity of national service efforts and the timely execution of FY 25 funding initiatives. Without urgent intervention, Kentucky's communities risk losing critical services provided through schools, food banks, shelters, and disaster response efforts. Thousands of AmeriCorps members and volunteers stand to be left without placements, support, or the opportunity to serve, eroding the progress and partnerships built over decades. The cascading impact of grant terminations and administrative delays will not only disrupt essential services but will also undermine public trust in the AmeriCorps brand and damage the infrastructure of service at a time when it is most needed. Serve Kentucky calls upon federal and state partners to act swiftly and decisively to stabilize the AmeriCorps program, prevent further harm to communities and service members, and ensure that national service continues to be a powerful force for good across the Commonwealth and the nation.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on May 5, 2025, at Louisville, Kentucky.



Joe Bringardner
Executive Director
Serve Kentucky

From: [AmeriCorpsAwardAction](#)
To: [Ramsey, Shannon \(CHFS DFRCVS KCCVS\)](#)
Cc: [AmeriCorpsAwardAction](#)
Subject: Termination Notice of AmeriCorps Award
Date: Friday, April 25, 2025 6:53:48 PM
Attachments: [KY_Commission.xlsx](#)

This Message Originated from Outside the Organization

This Message Is From an External Sender.

[Report Suspicious](#)

Shannon Ramsey
HEALTH SERVICES KENTUCKY CABINET FOR
275 E Main St
Frankfort
KY, 40601

RE: Grant Termination

Dear AmeriCorps Award Recipient:

Effective immediately, the AmeriCorps award subrecipient(s) included in the attached spreadsheet is/are being terminated per 2 CFR 200.340(a)(4) because it has been determined that the award no longer effectuates agency priorities. You must immediately cease all award activities. This is a final agency action and is not administratively appealable.

The provisions at [2 CFR 200.343 - Effects of Suspension and Termination](#) apply. This process ensures the equitable settlement of costs, proper disposition of government property, and mitigation of negative impacts on stakeholders. AmeriCorps staff will initiate an amendment to change the end date of the period of performance effective immediately.

Please immediately notify subrecipients and/or community partners, if applicable, and initiate your internal termination and closeout procedures.

Please review [Closeout Instructions for Grantees](#) to close out this Federal award within 120 days. Please note, there are some close-out actions that indicate that you must submit information to your portfolio manager. Instead of submitting to those individuals, you must instead submit to the following regional mailboxes:

- MidAtlantic@americorps.gov (DC, DE, MD, NJ, PA, PR, VA, VI, WV)
- Midwest@americorps.gov (IL, IN, KY, MI, OH)
- Mountain@americorps.gov (AZ, CO, ID, MT, NM, UT, WY)
- NorthCentral@americorps.gov (IA, MN, WI, ND, SD, NE, KS, MO)
- Northeast@americorps.gov (CT, MA, ME, NH, NY, RI, VT)
- SouthCentral@americorps.gov (AR, LA, MS, OK, TX)
- Southeast@americorps.gov (AL, FL, GA, NC, SC, TN)
- West@americorps.gov (AK, AS, CA, CNMI, GU, HI, NV, OR, WA)

Costs after termination are allowable if:

- (a) The costs result from financial obligations which were properly incurred before the effective date of termination, and
- (b) costs are for necessary and reasonable termination and closeout activities.

Please follow the program specific instructions below, based on the type of award that is being terminated.

AmeriCorps State and National

State commissions and prime grantees should immediately notify subgrantees, operating sites, and members and follow grant close-out procedures. All member activities should cease immediately. Members should be exited for compelling personal circumstances (CPC). The program should document that the member was exited for compelling personal circumstances due to the agency's termination of the grant and program closure. If possible, the program should try to have the member transferred to another program. If this is not possible, the program should note in the CPC documentation that member reassignment was not an option.

Jennifer Bastress Tahmasebi
Interim Agency Head